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3 LINDSEY GREER DOTSON
4 Assistant United States Attorney
5 Chief, Criminal Division
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18 Attorneys for Plaintiff
19 UNITED STATES OF AMERICA

20 UNITED STATES DISTRICT COURT

21 FOR THE CENTRAL DISTRICT OF CALIFORNIA

22 UNITED STATES OF AMERICA,

23 No. CR 24-621 (A)-MWF

24 Plaintiff,
25 v.
26 DURK BANKS,
27 aka "Lil Durk,"
28 aka "Blood,"
29 aka "Mustafa Abdul Malak,"
30 KAVON LONDON GRANT,
31 aka "Cuz,"
32 aka "Vonnie,"
33 DEANDRE DONTRELL WILSON,
34 aka "DeDe,"
35 KEITH JONES,
36 aka "Flacka,"
37 DAVID BRIAN LINDSEY,
38 aka "Brownneyz," and
39 ASA HOUSTON,
40 aka "Boogie,"

41 STIPULATION REGARDING REQUEST FOR
42 (1) CONTINUANCE OF TRIAL DATE AND
43 (2) FINDINGS OF EXCLUDABLE TIME
44 PERIODS PURSUANT TO SPEEDY TRIAL
45 ACT

46 DEFENDANTS BANKS and WILSON

47 **CURRENT TRIAL DATES:** 01/07/2025
48 **PROPOSED TRIAL DATE:** 10/14/2025

49 DEFENDANTS GRANT, JONES, LINDSEY,
50 AND HOUSTON

51 **CURRENT TRIAL DATES:** 01/14/2025
52 **PROPOSED TRIAL DATE:** 10/14/2025

53 Defendants.

54
55 Plaintiff United States of America, by and through its counsel
56 of record, the United States Attorney for the Central District of

1 California and Assistant United States Attorneys Ian V. Yanniello,
2 Gregory W. Stapes, and Daniel H. Weiner, and defendant DURK BANKS
3 ("defendant BANKS"), both individually and by and through his counsel
4 of record, Drew Findling, Marissa Goldberg, Jonathan Brayman, and
5 Christy O'Connor; defendant KAVON LONDON GRANT ("defendant GRANT"),
6 both individually and by and through his counsel of record, Peter
7 Swarth; defendant DEANDRE DONTRELL WILSON ("defendant WILSON"), both
8 individually and by and through his counsel of record, Daniel
9 Nardoni; defendant KEITH JONES ("defendant JONES"), both individually
10 and by and through his counsel of record, Damon Cheronis; defendant
11 DAVID BRIAN LINDSEY ("defendant LINDSEY"), both individually and by
12 and through his counsel of record, Simon Aval; and defendant ASA
13 HOUSTON ("defendant HOUSTON"), both individually and by and through
14 his counsel of record, Vitaly Sigal,¹ hereby stipulate as follows:

15 1. The First Superseding Indictment in this case was filed on
16 November 7, 2024. Defendant BANKS first appeared before a judicial
17 officer of the court in which the charges in this case were pending
18 on November 14, 2024. The Speedy Trial Act, 18 U.S.C. § 3161,
19 originally required that the trial commence on or before January 23,
20 2025. Defendant WILSON first appeared before a judicial officer of
21 the court in which the charges in this case were pending on November
22 15, 2024. The Speedy Trial Act, 18 U.S.C. § 3161, originally

23

24 ¹ After receiving a signed stipulation from all other
25 defendants, the government was informed by counsel for defendant
26 HOUSTON that defendant HOUSTON objects to a continuance of the trial
27 date. The government respectfully submits that there is good cause to
28 continue the trial date as to all defendants, including defendant
HOUSTON, pursuant to 18 U.S.C. § 3161(h)(6), because the time period
of January 14, 2025 to October 14, 2025, inclusive, constitutes a
reasonable period of delay for defendant HOUSTON, who is joined for
trial with the stipulating defendants as to whom the time for trial
has not run and no motion for severance has been granted.

1 required that the trial commence on or before January 24, 2025.
2 Defendants GRANT and HOUSTON first appeared before a judicial officer
3 of the court in which the charges in this case were pending on
4 November 21, 2024. The Speedy Trial Act, 18 U.S.C. § 3161,
5 originally required that the trial commence on or before January 30,
6 2025. Defendants JONES and LINDSEY first appeared before a judicial
7 officer of the court in which the charges in this case were pending
8 on November 22, 2024. The Speedy Trial Act, 18 U.S.C. § 3161,
9 originally required that the trial commence on or before January 31,
10 2025.

11 2. On November 14, 2024, for defendant BANKS, the Court set a
12 trial date of January 7, 2025. On November 15, 2024, for defendant
13 WILSON, the Court set a trial date of January 7, 2025. On November
14 21, 2024, for defendants GRANT and HOUSTON, the Court set a trial
15 date of January 14, 2025. On November 22, 2024, for defendants JONES
16 and LINDSEY, the Court set a trial date of January 14, 2025.

17 3. All defendants are detained pending trial. The parties
18 estimate that the trial in this matter will last approximately 14
19 days. All defendants are joined for trial and a severance has not
20 been granted.

21 4. By this stipulation, the parties move to continue the trial
22 date to October 14, 2025, and to set the following briefing schedule
23 for all motions other than motions *in limine*: a motions hearing date
24 of August 11, 2025; motions to be filed by June 30, 2025; oppositions
25 to such motions to be filed by July 14, 2025; and any reply briefs to
26 be filed on or before July 28, 2025.

27 5. This is the first request for a continuance.
28

1 6. Defendants request the continuance based upon the following
2 facts, which the parties believe demonstrate good cause to support
3 the appropriate findings under the Speedy Trial Act:

4 a. All defendants are charged with violations of 18
5 U.S.C. § 1958(a): Conspiracy and Use of Interstate Facilities to
6 Commit Murder-For-Hire Resulting in Death; and 18 U.S.C.
7 §§ 924(c)(1)(A)(iii), (c)(1)(B)(ii), (j)(1): Use, Carry, and
8 Discharge of Firearms and Machinegun, and Possession of Such
9 Firearms, in Furtherance of a Crime of Violence, Resulting in Death.
10 Defendant JONES is also charged with a violation of 18 U.S.C.
11 § 922(o): Possession of a Machinegun. The government is in the
12 process of producing discovery to the defense, which includes, among
13 other things, approximately 230 GB of digital evidence such as
14 audio/video recordings and surveillance footage, and approximately
15 20,000 pages of reports concerning murder and other violent acts,
16 photographs, witness statements, and medical documents.

17 b. Due to the nature of the prosecution and the number of
18 defendants, including the charges in the indictment and the
19 voluminous discovery that will be produced to defendants, this case
20 is so unusual and so complex that it is unreasonable to expect
21 adequate preparation for pretrial proceedings or for the trial itself
22 within the Speedy Trial Act time limits.

23 c. Defense counsel represent that they have various
24 substantive obligations which necessitate the continuance of the
25 trial to October 14, 2025. The list of obligations for defense
26 counsel is attached hereto as Appendix A and is incorporated as if
27 fully set forth herein.

1 d. In light of the foregoing, counsel for defendants also
2 represent that additional time is necessary to confer with
3 defendants, conduct and complete an independent investigation of the
4 case, conduct and complete additional legal research including for
5 potential pre-trial motions, review the discovery and potential
6 evidence in the case, and prepare for trial in the event that a
7 pretrial resolution does not occur. Defense counsel represent that
8 failure to grant the continuance would deny them reasonable time
9 necessary for effective preparation, taking into account the exercise
10 of due diligence.

11 e. Defendants believe that failure to grant the
12 continuance will deny them continuity of counsel and adequate
13 representation.

14 f. The government does not object to the continuance.

15 g. The requested continuance is not based on congestion
16 of the Court's calendar, lack of diligent preparation on the part of
17 the attorney for the government or the defense, or failure on the
18 part of the attorney for the Government to obtain available
19 witnesses.

20 7. For purposes of computing the date under the Speedy Trial
21 Act by which defendants BANKS' and WILSON's trial must commence, the
22 parties agree that the time period of January 7, 2025 to October 14,
23 2025, inclusive, should be excluded pursuant to 18 U.S.C.
24 §§ 3161(h)(7)(A), (h)(7)(B)(i), (h)(7)(B)(ii) and (h)(7)(B)(iv)
25 because the delay results from a continuance granted by the Court at
26 defendant's request, without government objection, on the basis of
27 the Court's finding that: (i) the ends of justice served by the
28 continuance outweigh the best interest of the public and defendant in

1 a speedy trial; (ii) failure to grant the continuance would be likely
2 to make a continuation of the proceeding impossible, or result in a
3 miscarriage of justice; (iii) the case is so unusual and so complex,
4 due to the nature of the prosecution and the number of defendants
5 that it is unreasonable to expect preparation for pre-trial
6 proceedings or for the trial itself within the time limits
7 established by the Speedy Trial Act; and (iv) failure to grant the
8 continuance would unreasonably deny defendant continuity of counsel
9 and would deny defense counsel the reasonable time necessary for
10 effective preparation, taking into account the exercise of due
11 diligence.

12 8. For purposes of computing the date under the Speedy Trial
13 Act by which defendant's trial must commence, the parties agree that
14 for defendants BANKS and WILSON the time period of January 7, 2025 to
15 October 14, 2025, inclusive, and for defendants GRANT, JONES,
16 LINDSEY, and HOUSTON, the time period of January 14, 2025 to October
17 14, 2025, inclusive, should be excluded pursuant to 18 U.S.C.
18 §§ 3161(h)(7)(A), (h)(7)(B)(i), (h)(7)(B)(ii) and (h)(7)(B)(iv)
19 because the delay results from a continuance granted by the Court at
20 defendant's request, without government objection, on the basis of
21 the Court's finding that: (i) the ends of justice served by the
22 continuance outweigh the best interest of the public and defendant in
23 a speedy trial; (ii) failure to grant the continuance would be likely
24 to make a continuation of the proceeding impossible, or result in a
25 miscarriage of justice; (iii) the case is so unusual and so complex,
26 due to the nature of the prosecution and the number of defendants
27 that it is unreasonable to expect preparation for pre-trial
28 proceedings or for the trial itself within the time limits

1 established by the Speedy Trial Act; and (iv) failure to grant the
2 continuance would unreasonably deny defendant continuity of counsel
3 and would deny defense counsel the reasonable time necessary for
4 effective preparation, taking into account the exercise of due
5 diligence.

6 9. Nothing in this stipulation shall preclude a finding that
7 other provisions of the Speedy Trial Act dictate that additional time
8 periods be excluded from the period within which trial must commence.
9 Moreover, the same provisions and/or other provisions of the Speedy
10 Trial Act may in the future authorize the exclusion of additional
11 time periods from the period within which trial must commence.

12 IT IS SO STIPULATED.

13 Dated: December 31, 2024 Respectfully submitted,

14 E. MARTIN ESTRADA
United States Attorney

15 LINDSEY GREER DOTSON
Assistant United States Attorney
Chief, Criminal Division

16
17
18 _____ /s/
IAN V. YANNIELLO
GREGORY W. STAPLES
DANIEL H. WEINER

19
20 Assistant United States Attorneys
21
22 Attorneys for Plaintiff
UNITED STATES OF AMERICA

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1 I am DURK BANKS' attorney. I have carefully discussed every
2 part of this stipulation and the continuance of the trial date with
3 my client. I have fully informed my client of his Speedy Trial
4 rights. To my knowledge, my client understands those rights and
5 agrees to waive them. I believe that my client's decision to give up
6 the right to be brought to trial earlier than October 14, 2025 is an
7 informed and voluntary one.

8 

12/24/24

Date

9 DREW FINDLING
10 MARISSA GOLDBERG
11 JONATHAN BRAYMAN
12 CHRISTY O'CONNOR
13 Attorney for Defendant
DURK BANKS

14 I have read this stipulation and have carefully discussed it
15 with my attorney. I understand my Speedy Trial rights. I
16 voluntarily agree to the continuance of the trial date, and give up
17 my right to be brought to trial earlier than October 14, 2025.

18 

12/24/24

Date

19 DURK BANKS
Defendant

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I am KAVON LONDON GRANT's attorney. I have carefully discussed every part of this stipulation and the continuance of the trial date with my client. I have fully informed my client of his Speedy Trial rights. To my knowledge, my client understands those rights and agrees to waive them. I believe that my client's decision to give up the right to be brought to trial earlier than October 14, 2025 is an informed and voluntary one.



12/24/2024

Date

PETER SWARTH
Attorney for Defendant
KAVON LONDON GRANT

I have read this stipulation and have carefully discussed it with my attorney. I understand my Speedy Trial rights. I voluntarily agree to the continuance of the trial date, and give up my right to be brought to trial earlier than October 14, 2025.



12-24-24

Date

KAVON LONDON GRANT
Defendant

1 I am DEANDRE DONTRELL WILSON's attorney. I have carefully
2 discussed every part of this stipulation and the continuance of the
3 trial date with my client. I have fully informed my client of his
4 Speedy Trial rights. To my knowledge, my client understands those
5 rights and agrees to waive them. I believe that my client's decision
6 to give up the right to be brought to trial earlier than October 14,
7 2025 is an informed and voluntary one.

8 

12-20-24

9 _____
10 Date

DANIEL NARDONI
Attorney for Defendant
DEANDRE DONTRELL WILSON

11
12 I have read this stipulation and have carefully discussed it
13 with my attorney. I understand my Speedy Trial rights. I
14 voluntarily agree to the continuance of the trial date, and give up
15 my right to be brought to trial earlier than October 14, 2025.

16 

12/20/24

17 Date

DEANDRE DONTRELL WILSON
Defendant

1 I am KEITH JONES' attorney. I have carefully discussed every
2 part of this stipulation and the continuance of the trial date with
3 my client. I have fully informed my client of his Speedy Trial
4 rights. To my knowledge, my client understands those rights and
5 agrees to waive them. I believe that my client's decision to give up
6 the right to be brought to trial earlier than October 14, 2025 is an
7 informed and voluntary one.



12/20/24

9 DAMON CHERONIS
10 Attorney for Defendant
KEITH JONES

Date

11
12 I have read this stipulation and have carefully discussed it
13 with my attorney. I understand my Speedy Trial rights. I
14 voluntarily agree to the continuance of the trial date, and give up
15 my right to be brought to trial earlier than October 14, 2025.



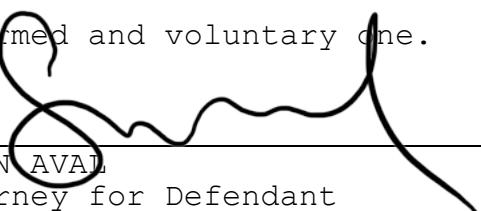
12/27/24

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17 KEITH JONES
Defendant

Date

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1 I am DAVID BRIAN LINDSEY's attorney. I have carefully discussed
2 every part of this stipulation and the continuance of the trial date
3 with my client. I have fully informed my client of his Speedy Trial
4 rights. To my knowledge, my client understands those rights and
5 agrees to waive them. I believe that my client's decision to give up
6 the right to be brought to trial earlier than October 14, 2025 is an
7 informed and voluntary one.

8 
9 SIMON AVAIL
10 Attorney for Defendant
DAVID BRIAN LINDSEY

12 | 17 | 24
Date

11
12 I have read this stipulation and have carefully discussed it
13 with my attorney. I understand my Speedy Trial rights. I
14 voluntarily agree to the continuance of the trial date, and give up
15 my right to be brought to trial earlier than October 14, 2025.

16 
17 DAVID BRIAN LINDSEY
Defendant

12 | 17 | 24
Date

APPENDIX A

Counsel for Defendant Banks:

Christy O'Connor:

United States v. Kevin Ontiveros, Case No. 23-cr-00411(A)-HDV; Violation of 18 U.S.C. § 1959 (Violent Crime in Aid of Racketeering); Trial date July 15, 2025; Trial estimate 30 days.

Marissa Goldberg:

United States v. Tyquan Watson, 4:24-cr-00003 N.D. Florida, 4 defendant jury trial, 2/11/25

Drew Findling and Marissa Goldberg:

United States v. Del Entertainment, et al., CR 22-267-MEMF, 3/17/25, Jury Trial

Jonathan Brayman:

1. Jan 21-Jan 29, 2025: People v. Javon Almond, No. 18CR-0881402 (state first-degree murder case in Cook County, Ill.)
2. April 14-23, 2025: USA v. David Winchell, No. 2:22CR-0096 (federal drug trafficking trial in ND Ind.)
3. May 19-30, 2025: USA v. Paul DeLong, No. 20CR-211 (federal drug and money laundering conspiracy case in N.D. Ill.)
4. June 10-July 3, 2025: USA v. Chong Phu, 5:24-cr-146-R (federal drug and money laundering conspiracy case in W.D. Okla.)
5. Oct 6-10, 2025: USA v. Tony Bell, No. 22CR-110 (federal fraud case in N.D. Ill.)
6. Dec 15-23, 2025: USA v. James Colucci, No. 22CR-269 (federal honest services and bribery case in N.D. Ill.)

Counsel for Defendant Grant:

1. US v Rundo, 18-cr-758-JLS-2, (Robert Boman), trial set to begin 2/18/25, conspiracy to riot, expected to last 3 days.
 1. US v Emilio Herrera, 24-cr-390-SVW-1, (Emilio Herrera), trial set to begin 2/25/25, armed robbery, expected to last 3 days.

2. US v Valencia, 24-cr-204-SSS-4, (Leodegario Salazar-Suastegui), trial set to begin 3/31/25, contract for murder, expected to last 1 week.
3. US v Oscar Vargas Garcia, 24-cr-38-FWS-1, (Oscar Vargas Garcia), trial set to begin 4/15/25, narcotics/guns, expected to last 2 weeks.
4. US v. Bazan, 20-cr-19-CJC-23 (Carlton Young), trial set to begin 7/14/25, narcotics conspiracy, expected to last 2 weeks

5. US v Felix Starnes, 23-cr-167-JWH-8 (Ricardo Moreno Gonzalez), trial set to begin 8/4/25, narcotics conspiracy, expected to last 15 days.

6. US v Haviland, 24-cr-570-WLH-41, (Elmer Villtoro), trial set to begin 2/24/26, narcotics conspiracy, expected to last 21 days

Counsel for Defendant Wilson:

1. US v. Lerma, 18-172(A)-GW (JV Gonzalez), murder and RICO, expected to last 5 weeks, set to begin on 2/25/2025.
2. People v. Efrain Ramirez, BA432701-01, murder, expected to last 4 weeks, set to begin in late May 2025.
3. US v. Claire Haviland, 24-570-WLH, a 69-defendant RICO trial, set to begin on 11/25/2025.

Counsel for Defendant Jones:

1. People v. John Powers IV, 24CR6020301, expected to last 2 days, set to begin 1/23/25
2. People v. David Soto, 24DV0701101, expected to last 1 day, set to begin 2/10/25
3. US v. Johnny Montgomery, 22-cr-576, expected to last 1 week, set to begin 2/28/25
4. US v. David Winchell, 22-cr-96, expected to last 1 week, set to begin 4/14/25
5. US v. David Lira, 23-cr-54, expected to last 2 weeks, set to begin 7/14/25
6. US v. Raymon Paparella, expected to last 1 to 2 weeks, set to begin 10/20/25

Counsel for Defendant Lindsey:

1. People v. Jonathan Johnson, Case No. VA 151153, a single defendant Special Circumstances Murder Trial (Death Penalty is not sought by the Government). Trial is set to begin

on January 7, 2025. This Jury Trial is estimated to last 3 Weeks. Defendant is alleged to have been the driver and a shooter during a drive-by shooting where two men were killed. No further continuances are expected.

2. People v. Jorge Ramirez, Case No. VA 150980, a multi-defendant Murder case. Trial is set to begin in February of 2025 and is estimated to last 3 weeks. Defendant is accused of First-Degree Murder using a firearm. It is unknown at this time whether the parties will seek a continuance.

3. People v. Kayelynn Bearden, Case No. NA118311, a single defendant case where the defendant is charged with Attempted Murder and facing life imprisonment. Trial is set to begin in March 2025 and is estimated to last 3 weeks. No further continuances are expected.

4. United States v. Juan Manuel Quiroz Jimenez, Case No. 2:24-00369-SPG, a multi-defendant Drug Distribution Trial is set to begin on May 6, 2025, and is expected to last approximately 3 weeks.

5. People v. James Salinas, Case No. BA499975, a multi-defendant Double Murder case. Trial is set to begin in June of 2025 and is estimated to last 4 weeks. It is unknown at this time whether the parties will seek a continuance.

6. People v. Luis Ventura, Case No. BA516784, a multi-defendant Double Murder case. Trial is set to begin in July of 2025 and is estimated to last 4 weeks. It is unknown at this time whether the parties will seek a continuance.

7. United States v. Miguel Barajas, Case No. 2:24-00471-MWF, a multi-defendant Money Laundering and Fraud Trial is set to begin on August 19, 2025, and is expected to last approximately 3 weeks.